

A F F I D A V I T

I, Rebecca Shea, being duly sworn, do hereby depose and say:

1. Your affiant has been a Special Agent (SA) with Homeland Security Investigations (HSI) since 2009. As an HSI Special Agent, your affiant completed the Federal Criminal Investigator Training Program (CITP) and the HSI Academy training, your affiant was instructed in all phases of criminal investigations such as: Criminal Law, Search and Seizure, Investigative Techniques, Firearm Proficiency, and Evidence Handling. Your affiant has led and participated in numerous investigations of crimes involving drug smuggling, firearms trafficking, immigration, and other violations.

2. Your affiant has been the case agent on multiple contraband smuggling investigations to include firearms trafficking and narcotics smuggling. Your affiant has been the affiant of federal Title III wire taps and the case agent on several Organized Crime and Drug Enforcement Task Force (OCDETF) cases. Your affiant is experienced with conducting surveillance, serving as the control agent for confidential sources, and investigating violations of the Immigration and Nationality Act (INA).

3. This affidavit is being submitted for the purpose of establishing probable cause that Saul LOPEZ-Rojas (hereinafter referred to as LOPEZ-Rojas), has violated 8 U.S.C. § 1326(a) Illegal Reentry of Removed Alien.

4. The information in this affidavit is based on my personal knowledge, information provided by other law enforcement officers and individuals, and the reports and memoranda of other law enforcement officers. The information in this affidavit is provided for the limited of establishing probable cause in connection with this application for a criminal complaint and an arrest warrant. This affidavit does not include all the information gathered during this

investigation. The following information is based on my personal knowledge, the knowledge of other agents and officers, as well as investigations conducted by other law enforcement entities.

PROBABLE CAUSE-ILLEGAL RENTRY

5. On or about February 27, 2025, Dublin police officers conducted a traffic stop on a 2008 black Mercedes-Benz bearing Ohio registration JOH-8478 (hereinafter referred to as the TARGET VEHICLE). A search of the Ohio Bureau of Motor Vehicles reveals the TARGET VEHICLE is registered to EVOLDER SERVICES at 3338 Riverside Green Drive, Dublin, Ohio 43017. LOPEZ-Rojas was the driver of the TARGET VEHICLE and provided officers with his Mexico Consular ID card (A00477463) and Mexican driver's license (14017375). Both identification documents bore the name Saul LOPEZ-Rojas and the Consular ID card contained a date of birth. The Mexico Consular ID contained the same address as the vehicle registration for the TARGET VEHICLE.

6. The photos depicted in the Mexico Consular ID card and the Mexican driver's license appeared to match the subject presenting them. Comparison to immigration booking photos of the subject matching the name and date of birth contained on the identification documents appeared to match the subject of the traffic stop.

7. Subsequent to the traffic stop, LOPEZ-Rojas was cited for speeding and not having an operator's license and released.

8. Based on my training and experience, your affiant knows that a DHS "A-File" is a file in which all immigration records are maintained for aliens admitted or found to be illegally present in the United States. Your affiant also knows that a DHS A-File usually contains forms, photographs, fingerprints, court records of conviction, and all records relating to deportation or other actions by DHS (or INS) with respect to the subject alien for whom the DHS A-File is

maintained. The A-file corresponds with an “A-number”, a unique number assigned to foreign nationals as they undergo proceedings through the United States immigration system.

9. According to his A-file, LOPEZ-Rojas is a citizen of Mexico and has no legal status in the United States. A search of immigration databases and a criminal history search revealed the following immigration history:

10. On or about March 23, 2009, immigration officers encountered LOPEZ-Rojas in the Franklin County jail located in Columbus, Ohio where he was being held on state charges of possession of a controlled substance and drug paraphernalia.

11. LOPEZ-Rojas was determined to be an alien present in the United States without being admitted or paroled or who arrived in the United States at any time or place other than as designated by the Attorney General. On that same day, LOPEZ-Rojas was served with a Notice to Appear (Form I-862) and held in a detained setting pending immigration proceedings.

12. On April 2, 2009, LOPEZ-Rojas was ordered removed from the United States by an Immigration Judge, at or near Cleveland, Ohio. On April 7, 2009, LOPEZ-Rojas was removed to Mexico via the El Paso, Texas Port of Entry (POE).

13. On or about June 17, 2013, the Columbus ERO Fugitive Operations Team encountered LOPEZ-Rojas in Columbus, Ohio and placed him under arrest for violations of the Immigration and Nationality Act and in connection with two open warrants originating in Perry Township, Ohio.

14. On July 12, 2013, a designated official (the Field Office Director) reinstated the prior order of removal against LOPEZ-Rojas. On July 17, 2013, LOPEZ-Rojas was removed to Mexico via the Laredo, Texas POE.

CRIMINAL HISTORY

15. On or about March 14, 2007, LOPEZ-Rojas was arrested for Operating a Motor Vehicle while Impaired. On March 30, 2007, LOPEZ-Rojas was convicted of OVI-Impaired M1 (misdemeanor).

16. On or about March 18, 2009, LOPEZ-Rojas was arrested for possession of controlled substances and possession of drug paraphernalia. The disposition of this case is unknown, but based on his immigration history, it is likely LOPEZ-Rojas was deported before a resolution of these charges.


17. Your affiant also reviewed DHS Indices that track lawful entries into the United States. Those indices indicated that LOPEZ-Rojas had not lawfully entered the United States, nor had he applied for nor obtained permission from the Attorney General of the United States or her designated successor or the Secretary of Homeland Security, to re-enter the United States legally since LOPEZ-Rojas had last been deported.

18. Based on the foregoing facts, there is probable cause to believe that LOPEZ-Rojas has violated 8 U.S.C. § 1326(a) Illegal Reentry of Removed Alien.

REBECCA
L SHEA
Digitally signed by
REBECCA L SHEA
Date: 2025.04.07
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REBECCA SHEA
Special Agent – HSI

Subscribed and sworn to before me on this 8th day of April, 2025.



CHELSEY M. VASCURA
UNITED STATES MAGISTRATE JUDGE